MAR 1 9 1992 HUB LAW OFFICES 1 Ford Greene, Esquire HOWARD HANSON MARIN COUNTY CLERK California State Bar No. 107601 2 711 Sir Francis Drake Boulevard By E. Keswick, Deputy San Anselmo, California 94960-1949 3 Telephone: (415) 258-0360 4 Attorney for Defendant GERALD ARMSTRONG 5 6 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 RECEIVED IN AND FOR THE COUNTY OF MARIN 9 MAR 1 9 1992 10 No. 152 229 CHURCH OF SCIENTOLOGY HUB LAW OFFICES 11 INTERNATIONAL, a California 12

not-for-profit religious corporation;

Plaintiffs,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

DEFENDANT'S
OBJECTIONS TO PLAINTIFF'S
EVIDENCE SUBMITTED IN
SUPPORT OF PRELIMINARY

EVIDENCE SUBMITTED IN SUPPORT OF PRELIMINARY INJUNCTION

Date: March 20, 1992

Time: 9:00 a.m.

Dept: Four - Specially Set

TO: ALL INTERESTED PARTIES AND TO THEIR ATTORNEYS OF RECORD.

PLEASE TAKE NOTICE that Defendant Gerald Armstrong hereby submits his objections to the evidence submitted by plaintiff is support of its motion for preliminary injunction as follows:

Evidentiary Item 2-B to Declaration of Andrew Wilson.

Object on the basis of lack of foundation, lack of authentication, lack of personal knowledge, and hearsay.

27 ///

28 ///

13

14

15

16

17

18

19

20

21

22

23

25

26

HUB LAW OFFICES Ford Greene, Esquire 711 Sir Francis Drake Blvd. San Anselmo, CA 94960 (415) 258-0360

Page 1.

DEFENDANT'S OBJECTIONS TO PLAINTIFF'S EVIDENCE RE PRELIMINARY INJUNCTION

Evidentiary Item 3 - Declaration of Lynn R. Farney.

Object to the entire declaration on the basis of best evidence, lack of foundation, lack of authentication, lack of personal knowledge, hearsay, and on the basis of an estoppel created by Paragraph 7I of the Settlement Agreement.

6

7

8

9

10

11

12

5

1

2

3

4

Evidentiary Item 3 - Declaration of Lawrence E. Heller.

Objection to the statements in 2:8-17 on the basis of hearsay and best evidence.

Objection to 2:19-3:5 on the basis of no demonstration of personal knowledge (i.e. "It was explained" at 2:19-20, does not establish that "I explained" or even that "I heard") and hearsay.

13

14

15

16

17

18

Verified Complaint

As the complaint has been verified by plaintiff's counsel, Andrew H. Wilson, the complaint is objectionable because lack of foundation, lack of authentication, lack of personal knowledge, hearsay, and on the basis of an estoppel created by Paragraph 7I of the Settlement Agreement.

19 20

Respectfully submitted:

HUB LAW OFFICES

21

DATED: March 19, 1992

23

22

24

25

26

27

28

Page 2.

HUB LAW OFFICES Ford Greene, Esquire 711 Sir Francis Drake Blvd. San Anselmo, CA 94960 (415) 258-0360 By:
FOR

FORD GREENE
Attorney for Defendant
GERALD ARMSTRONG

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following DEFENDANT'S OBJECTIONS TO PLAINTIFF'S EVIDENCE IN documents: SUPPORT OF PRELIMINARY INJUNCTION on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California: By Telecopier Andrew H. Wilson 415-954-0938 WILSON, RYAN & CAMPILONGO 235 Montgomery Street, Suite 450 San Francisco, California 94104 By Telecopier Graham E. Berry, Esquire 213-750-7900 LEWIS, D'AMATO, BRISBOIS & BISGAARD 221 North Figueroa Street. Suite 1200 Los Angeles, California 90012 By Telecopier LAURIE J. BARTILSON, ESQ. 213-662-6419 Bowles & Moxon 17 6255 Sunset Boulevard, Suite 2000 Los Angeles, California 90028 18

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[X] (State) 21

I declare under penalty of perjury under the laws of the State of California that the above

is true and correct.

DATED:

March 19, 1992

24

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

19

20

22

23

25

26

27

28

HUB LAW OFFICES Ford Greene, Esquire 711 Sir Francis Drake Blvd. San Anselmo, CA 94960 (415) 258-0360

Page 3.

DEFENDANT'S OBJECTIONS TO PLAINTIFF'S EVIDENCE RE PRELIMINARY INJUNCTION